

## Potential Petroleum Contaminants<sup>1</sup>

| <b>Petroleum Product or Waste</b>                     | <b>Soil</b>   | <b>Ground Water</b>   | <b>Air/<br/>Soil Gas</b> | <b>Typical Products/Wastes</b>  |
|---|---|---|--------------------------|---|
| <b>Gasoline Range Product</b>                         | VOCs <sup>2</sup><br>Naphthalenes <sup>3</sup><br>Lead and Lead Scavengers <sup>4</sup> | VOCs <sup>2</sup><br>Naphthalenes <sup>3</sup><br>Lead and Lead Scavengers <sup>4</sup> | VOCs <sup>5</sup>        | Automotive Gas<br>Aviation Gas<br>Racing Fuel<br>Mineral Spirits<br>Stoddard Solvent<br>Naphtha<br>Jet Fuel - JP-4<br>Ethanol fuels |
| <b>Diesel Range Product</b>                           | VOCs <sup>2</sup><br>PAHs <sup>6</sup>  | VOCs <sup>2</sup><br>PAHs <sup>6</sup>  | VOCs <sup>5</sup>        | Diesel #1 & 2<br>Kerosene<br>Jet Fuel-JP #5, 7 & 8<br>Light Oil<br>Home Heating Oil<br>Biodiesel <100%                              |
| <b>Hydrocarbon Oils Range Product</b>                 | PAHs <sup>6</sup>   | PAHs <sup>6</sup>   | None                     | #4, 5, & 6 Fuel Oil<br>Bunker C<br>Mineral Oil<br>Virgin Motor Oil<br>Hydraulic Oil   |
| <b>Waste/Used Oil and Unknown Products and Wastes</b> | VOCs <sup>2</sup><br>PAHs <sup>6</sup><br>Lead and Lead Scavengers <sup>4</sup>         | VOCs <sup>2</sup><br>PAHs <sup>6</sup><br>Lead and Lead Scavengers <sup>4</sup>         | VOCs <sup>5</sup>        | Waste/Used Oil<br>Unknown refined petroleum product or waste  |

<sup>1</sup> Scope and general guidance – This table is intended for use when investigating refined petroleum releases at regulated UST sites. Consult the IDEM Project manager regarding: 1) laboratory methods based on site-specific needs and cost effectiveness; 2) modification of contaminant reporting once the site characterization is completed; 3) potential petroleum contaminants for products not listed in this table; and 4) additional reporting based on site-specific information.

<sup>2</sup> VOC Methods - During site characterization use SW846 Method 8260B and report all VOCs and naphthalenes. SW846 Method 8021 may be more cost effective during Corrective Action Plan (CAP) Implementation and closure monitoring and should be considered when seeking reimbursement from the Excess Liability Trust Fund (ETLF). Identify which methods are proposed in the CAP.

<sup>3</sup> Naphthalenes – Report naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene.

<sup>4</sup> Lead and Lead Scavenger Methods – Report total lead and lead scavengers when investigating aviation gas and racing fuel, and when automotive gas was used or stored before January 1, 1996. Lead scavengers include EDB (ethylene dibromide or 1,2-dibromoethane) and 1,2-DCA (1,2-dichloroethane). Use EPA Methods with appropriate detection limits. Ground water samples for lead analysis should be unfiltered.

<sup>5</sup> Air VOC Method – Report all VOCs. Use Method TO-15 for VOC.

<sup>6</sup> PAHs Methods – Report all PAHs. Use SW846 Method 8270 SIM, 8310 or other appropriate method for PAHs.

## **Transition to the Remediation Closure Guide**

The transition period for the Remediation Closure Guide (RCG) ends six months from its effective date. The effective date of the RCG is March 22, 2012, therefore the transition period will end September 22, 2012.

- For the Leaking Underground Storage Tank Program, a party(s) may choose to use either previously applicable guidance or the new guidance if a Corrective Action Plan (CAP) has been submitted to IDEM prior to September 22, 2012.
- If the CAP has not been submitted before the end of the transition period, then IDEM will refer to current guidance and applicable rules and laws when evaluating proposed remediation work plans and remediation objectives.
- For additional information please refer to Section 1.4 of the Remediation Program Guide.

## **Potential Petroleum Contaminants**

The LUST Potential Petroleum Contaminants (PPCs) Table 3.1 of the Remediation Program Guide was updated in Errata on July 9, 2012. TPH is no longer a PPC for LUST sites under the RCG/RPG. Sites that have a previously approved CAP utilizing TPH Remediation Objectives for soils should continue to evaluate TPH at closure or submit a Corrective Action Plan Addendum (CAPA) outlining a request to transition the Site to the RCG. Additional guidance can be provided by the IDEM LUST PM regarding site specific transition requirements and requests. Please see the PPC table attached. For other recent updates to the RPG please see the following link:

[http://www.in.gov/idem/files/remediation\\_program\\_guide\\_errata.pdf](http://www.in.gov/idem/files/remediation_program_guide_errata.pdf)

## **Why are you now required to report all VOCs for gasoline and other petroleum releases?**

HEA1162 amended several statutes regulating environmental remediation projects. It became effective July 1, 2009. In addition, U.S. EPA recommended that IDEM require screening for lead scavengers due to evidence showing that it may be present ([www.epa.gov/oust/cat/lead\\_scavengers\\_memo\\_05212010.pdf](http://www.epa.gov/oust/cat/lead_scavengers_memo_05212010.pdf)). Finally, IDEM has evidence that while BTEX and MTBE are remediated to acceptable levels, other VOCs may be present above acceptable levels. With the implementation of the RCG and RPG, IDEM seeks to comply with its statutory mandate to make risk-based decisions when developing remediation objectives and fulfill EPA's recommendations through assessment of all potential risks associated with VOCs from petroleum releases.